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 James Dzurenda and Michael Minev*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GREGORY BOLIN,
 Plaintiff,

v.

DR. KOHN, *et al.*,
 Defendants.

Case No. 3:23-cv-00168-MMD-CLB

**ORDER GRANTING
 UNOPPOSED MOTION FOR
 EXTENSION OF TIME TO FILE
 RESPONSE TO MOTION FOR
 PRELIMINARY INJUNCTION
 (ECF No. 58)
 (Fourth Request)**

Defendants James Dzurenda and Michael Minev, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Douglas R. Rands, Senior Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby submit this *Unopposed Motion for Extension of Time to file Response to Preliminary Injunction*.

MEMORANDUM OF POINTS AND AUTHORITIES

I. BACKGROUND AND RELEVANT PROCEDURAL HISTORY

Mr. Bolin filed this case alleging violations of his constitutional rights.(ECF No. 5) Defendants have accepted service.(ECF No. 13) On or about March 25, 2024, this Court issued a Scheduling Order and Discovery Plan.(ECF No. 29) Mr. Bolin filed a Motion for Preliminary Injunction on June 2, 2025. (ECF No. 58) The response was due on June 16, 2025. This Court granted one extension of time to July 11, 2025 to file the response. (ECF No. 64) In preparation for filing the response, Counsel for the Defendants reviewed the requests which serve as the basis for the Motion for Preliminary Injunction. The NDOC

1 can likely agree to the substance of the requests. However, additional time will be
2 necessary to work out the details and arrive at an agreement with both sides.

3 The Parties believe it is likely that an agreement can be reached that will satisfy
4 both sides and obviate the necessity for the Court to decide the motion. However, in
5 attempting to finalize an agreement, the State of Nevada has suffered a massive cyber
6 incident which has shut down internet, telephone, data and virtual files for the entire State
7 of Nevada. The Office of the Attorney General has been shut down for the last two days,
8 and Counsel has been forced to file this Motion from his home computer. Counsel has no
9 access to his case files, internet or even his office computer. Counsel has discussed this
10 matter with Counsel for Mr. Bolin, and they have no objection to additional time. Therefore,
11 the Defendants request additional time for the response, if necessary.

12 **II. APPLICABLE LAW FOR MOTION TO STAY DISCOVERY**

13 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
14 follows:

15 When an act may or must be done within a specified time, the
16 court may, for good cause, extend the time: (A) with or without
17 motion or notice if the court acts, or if a request is made, before
18 the original time or its extension expires; or (B) on motion made
after the time has expired if the party failed to act because of
excusable neglect.

19 Defendant's request is timely and will not hinder or prejudice Mr. Bolin's case but will
20 allow for a thorough opportunity to respond to the motion. The requested extension of
21 time should permit the Defendant time to adequately gather the required exhibits and
22 prepare the response. Defendant asserts that the requisite good cause is present to
23 warrant the requested extension of time. The cyber issue has prevented the Office of the
24 Attorney General to accomplish any work for the last several days. The parties are
25 working on a resolution of the underlying issue contained in the Motion for Preliminary
26 Injunction. This is the fourth extension request on this response and is made in good
27 faith.
28

1 **III. CONCLUSION**

2 Defendants assert that the requisite good cause and extenuating circumstances are present to
3 warrant the requested extension of time. Therefore, Defendants requests an extension to file their
4 response to Plaintiff's Motion for Preliminary Injunction. The Defendants request an extension of 10
5 days, or to **Friday, September 5, 2025**, to file the Defendants' response.

6
7 DATED this 26th day of August, 2025.

8 AARON D. FORD

9 Attorney General

10 /s/ Douglas R. Rands

11 Douglas R. Rands (Bar No. 3572)

Attorneys for Defendant

12 **IT IS SO ORDERED.**

13 **DATED:** August 27, 2025

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16 UNITED STATES MAGISTRATE JUDGE